

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 1567

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF PLAN
ADMINISTRATOR AND GUC TRUST FOR ENTRY OF A SECOND ORDER
(I) ENLARGING THE PERIOD WITHIN WHICH THE PLAN ADMINISTRATOR AND
GUC TRUST MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF**

Ann Aber, solely in her capacity as Plan Administrator² in the above-captioned cases, and the Joann GUC Trust (the “GUC Trust”), hereby certify that, as of the date hereof, no answer, objection, or other responsive pleading has been received to the *Motion of Plan Administrator and GUC Trust for Entry of a Second Order (I) Enlarging the Period Within Which the Plan Administrator and GUC Trust May Remove Actions and (II) Granting Related Relief* [Docket No. 1567] (the “Motion”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) on August 11, 2025. Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the “Proposed Order”). Pursuant to the Notice of Motion, objections or responses to the Motion were to be filed and served on the undersigned counsel by August 25, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”). The undersigned further certifies that the Objection Deadline has passed, the Court’s docket has

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion.

been reviewed in these cases, and no answer, objection, or other responsive pleading to the Motion appears thereon. It is hereby respectfully requested that the proposed Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: August 26, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Michael E. Fitzpatrick

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